

Date of Hearing: May 15, 2014
Time of Hearing: 9:30 am
Place of Hearing: Utica, NY

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK**

In Re:
Vincent D. Iocovozzi
Debtor

Case No. 13-62035-6-dd
Chapter 13

Objection to Motion for Relief from Stay

The Debtor, Vincent D. Iocovozzi, through his attorney, Carol Malz, Esq., objects to the Motion for Relief from Stay of GPO Federal Credit Union ("GPO"), and states as follows:

1. That the Debtor is modifying his Plan to purchase 329 S. Washington Street, Herkimer, New York through the bankruptcy.
2. That an appraisal of said property has already been filed with the court (Docket no. 32). The appraised value is one hundred thousand dollars (\$100,000.00).
3. That the "camp," 7688 State Route 28, Exeter, New York is fully rented out for the summer 2014.
4. That the Debtor is willing to oversee the rentals, and account for the proceeds following deduction for the rental realtor's commission.
5. That the camp remains on the market for sale.

WHEREFORE, the Debtor respectfully requests that the Court (1) deny the Motion for Relief from Stay as to 329 S. Washington Street, Herkimer, NY, (2) deny relief from the stay pending the summer rentals and continuing marketing of the camp, and (3) grant such other and further relief as this Court may deem just and proper.

Respectfully Submitted,

Dated: May 8, 2014

/s/ Carol Malz
Carol Malz, Esq.
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